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Keith A. Ovitt and Proposed Lead Counsel for the Class*

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION

FRED JEAN, Individually and on
Behalf of All Others Similarly
Situated,

Plaintiff,

v.

STEC, INC., MANOUCH
MOSHAYEDI and MARK
MOSHAYEDI,

Defendants.

Case No. 09-CV-1304 JVS (MLGx)

CLASS ACTION

**DECLARATION OF BLAIR A.
NICHOLAS IN SUPPORT OF
MOTION BY KEITH A. OVITT
FOR APPOINTMENT OF LEAD
PLAINTIFF AND APPROVAL OF
LEAD PLAINTIFF'S SELECTION
OF LEAD COUNSEL, AND
CONSOLIDATION OF ALL
RELATED ACTIONS**

Date: February 8, 2010
Time: 1:30 p.m.
Courtroom: 10C
Judge: Hon. James V. Selna

(caption continued on subsequent page)

1 HADI SAKHAI, Individually and on
2 Behalf of All Others Similarly
3 Situated,

4 Plaintiff,

5 v.

6 STEC, INC., MANOUCH
7 MOSHAYEDI, MARK
8 MOSHAYEDI, RAYMOND D.
9 COOK, J.P. MORGAN
10 SECURITIES INC., DEUTSCHE
BANK SECURITIES INC.,
BARCLAYS CAPITAL INC., and
OPPENHEIMER & CO. INC.,

11 Defendants.

Case No. 09-CV-1306 JVS (MLGx)

12 FRED GREENWALD, Individually
13 and on Behalf of All Others Similarly
14 Situated,

15 Plaintiff,

16 v.

17 STEC, INC., MANOUCH
18 MOSHAYEDI, and MARK
(MERHDAD) MOSHAYEDI,

19 Defendants.

Case No. 09-CV-1315 JVS (MLGx)

20 DANIEL MUNTER, Individually
21 and on Behalf of All Others Similarly
22 Situated,

23 Plaintiff,

24 v.

25 STEC, INC., MANOUCH
26 MOSHAYEDI, MARK
27 MOSHAYEDI and RAYMOND D.
COOK,

28 Defendants.

Case No. 09-CV-1320 JVS (MLGx)

MARCEL WEINBERGER,
Individually and on Behalf of All
Others Similarly Situated,

Plaintiff,

v.

STEC, INC., MANOUCH
MOSHAYEDI, MARK
MOSHAYEDI and RAYMOND D.
COOK,

Defendants.

Case No. 09-CV-1460 JVS (MLGx)

JONATHAN FISCHER, Individually
and on Behalf of All Others Similarly
Situated,

Plaintiff,

v.

STEC, INC., MANOUCH
MOSHAYEDI, MARK
MOSHAYEDI and RAYMOND D.
COOK,

Defendants.

Case No. 09-CV-8536 JVS (MLGx)

1 I, Blair A. Nicholas, declare as follows:

2 1. I am an attorney licensed to practice law in the State of California and
3 before this Court. I am a partner with the law firm of Bernstein Litowitz Berger &
4 Grossmann LLP, counsel for Keith A. Ovitt. I make this Declaration in Support of
5 the Motion by Mr. Ovitt for: (i) appointment as Lead Plaintiff in this action; (ii)
6 approval of his selection of counsel and appointment as Lead Counsel of Bernstein
7 Litowitz Berger & Grossmann LLP; and (iii) consolidation of all related actions.

8 2. Attached as Exhibits to this Declaration are true and correct copies of
9 the following:

10 Exhibit A: Certification of Keith A. Ovitt;

11 Exhibit B: Chart of Keith A. Ovitt's transactions in STEC, Inc.
12 securities;

13 Exhibit C: Notices of Pendency of Action; and

14 Exhibit D: Firm Biography of Bernstein Litowitz Berger &
15 Grossmann LLP.

16 I declare under penalty of perjury under the laws of the State of California
17 that the foregoing is true and correct. Executed this 5th day of January, 2010, at
18 San Diego, California.

19 /s/ Blair A. Nicholas

20 BLAIR A. NICHOLAS